

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PERSIDA ZLATKOV and CARLOS :  
ENRIQUE RUIZ, :  
Plaintiffs, : Civil Action No. 1-22-cv-8757-CM  
v. : Document Filed Electronically  
CITIBANK, N.A., :  
Defendant. : **NOTICE OF MOTION TO COMPEL**  
: **ARBITRATION AND STAY THE**  
: **PROCEEDINGS**  
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**PLEASE TAKE NOTICE** that, on a date and time as may be set by the Court, Defendant Citibank, N.A. (“Citibank”), by and through its undersigned attorneys, Sills Cummis & Gross P.C., will move before the Honorable Colleen McMahon, United States District Court Judge, at the United States District Court, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, for an Order: (1) pursuant to Federal Arbitration Act, 9 U.S.C. § 1, et seq., compelling Plaintiffs Persida Zlatkov and Carlos Enrique Ruiz (“Plaintiffs”), to arbitrate the claims asserted against Citibank in the above-captioned action (the “Action”); (2) staying the Action until such arbitration is complete; and (3) granting such other and further relief as the Court deems just, proper, and equitable.

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, Citibank will rely upon the accompanying Brief in Support of Defendant’s Motion to Compel Arbitration and to Stay the Proceedings, the Declaration of Joan Haslam, dated December 13, 2022, and exhibits annexed thereto.

**PLEASE TAKE FURTHER NOTICE** that Citibank hereby respectfully requests oral argument.

Dated: New York, New York  
December 16, 2022

Respectfully submitted,

/s/ *Tyler J. Kandel*

Tyler J. Kandel  
SILLS CUMMIS & GROSS P.C.  
101 Park Avenue, 28th Floor  
New York, New York 10178  
(212) 643-7000  
(212) 643-6500  
[tkandel@sillscummis.com](mailto:tkandel@sillscummis.com)  
*Attorneys for Defendant  
Citibank, N.A.*